

1 MATTHEW MACLEAR (State Bar No. 209228)

Email: mcm@atalawgroup.com

2 JASON FLANDERS (State Bar No. 238007)

Email: jrf@atalawgroup.com

3 ERICA A. MAHARG (State Bar No. 279396)

Email: eam@atalawgroup.com

4 J. THOMAS BRETT (State Bar No. 315820)

Email: jtb@atalawgroup.com

AQUA TERRA AERIS LAW GROUP

6 4030 Martin Luther King Jr Way

Oakland, CA 94609

7 Tel: (415) 568-5200

8 [Additional counsel on p. 2]

9 Attorneys for Plaintiff

10 CALIFORNIA SPORTFISHING

11 PROTECTION ALLIANCE

12 **UNITED STATES DISTRICT COURT**

13 **EASTERN DISTRICT OF CALIFORNIA**

14  
15  
16 CALIFORNIA SPORTFISHING PROTECTION  
ALLIANCE,

17 Plaintiff,

18 v.

19 PACIFIC BELL TELEPHONE COMPANY

20 Defendant.  
21  
22  
23  
24  
25  
26  
27  
28

**Case No.: 2:21-cv-00073-JDP**

**SUPPLEMENTAL DECLARATION  
OF MATTHEW MACLEAR IN  
SUPPORT OF PLAINTIFF'S MOTION  
FOR ATTORNEYS' FEES AND  
COSTS UNDER THE RESOURCE  
CONSERVATION AND RECOVERY  
ACT (42 U.S.C. § 6972(e)) AND CODE  
OF CIVIL PROCEDURE SECTION  
1021.5**

1 ANDREW L. PACKARD (State Bar No. 168690)

Email: andrew@packardlawoffices.com

2 LAW OFFICES OF ANDREW L. PACKARD

245 Kentucky Street, Suite B3

3 Petaluma, CA 94952

4 Tel: (707) 782-4060

Fax: (707) 782-4062

5 WILLIAM VERICK (State Bar No. 140972)

6 Email: wverick@igc.org

7 KLAMATH ENVIRONMENTAL LAW CENTER

1125 16th Street, Suite 204

8 Arcata, CA 95521

Tel: (707) 630-5061; Fax: (707) 630-5064

9 J. KIRK BOYD (State Bar No. 122759)

10 Email: jkb@drjkb.com

11 LAW OFFICE OF JOHN KIRK BOYD

548 Market St., Suite 1300

12 San Francisco, CA 94104-5401

Tel: (415) 440-2500

13 BRIAN ACREE (State Bar No. 202505)

14 Email: brian@brianacree.com

15 LAW OFFICES OF BRIAN ACREE

331 J Street, Suite 200

16 Sacramento, CA 95814

Tel: (916) 505-6861

17 WILLIAM CARLON (State Bar No. 305739)

18 Email: william@carlonlaw.com

19 LAW OFFICE OF WILLIAM CARLON

437 Post Street

20 Napa, CA 94559

Tel: (530) 514-4115

1 I, Matthew Maclear, declare:

2 1. The facts set forth in this declaration are based on my personal knowledge; if called  
3 to testify as a witness, I could and would competently testify thereto under oath. As to those matters  
4 that reflect a personal opinion, they reflect my personal opinion and judgment upon the matter.

5 2. I am more than eighteen years old and am competent to testify as to the matters set  
6 forth herein.

7 3. I am an attorney licensed to practice law in the State of California. I am a partner  
8 with Aqua Terra AERIS Law Group, representing California Sportfishing Protection Alliance in the  
9 above referenced action.

10 4. Since the Notice of Motion and Motion for Fees and Costs was filed, I have spent 6.9  
11 hours working on this matter. My time has been spent preparing this declaration, corresponding  
12 with co-counsel on counterarguments to Defendant's Opposition, exercising billing judgment,  
13 modifying lodestar spreadsheet, revising declarations and editing the reply. In an exercise of billing  
14 judgment, my hours sought during this time have been reduced by 1.2 hours, which equals 17%.

15 5. Attached hereto as **Exhibit 1** is a true and correct spreadsheet setting forth the time  
16 spent by each attorney on this case, recorded in tenths of an hour, with a description of what work  
17 was done. **Exhibit 1** accounts for the time expended by Plaintiff's counsel since the submission of  
18 Plaintiff's Motion for Attorneys' Fees and Costs on October 28, 2024.

19 I declare, under penalty of perjury under the laws of the United States that the foregoing is  
20 true and correct. Executed on the 6th of December 2024 in Orinda, California.  
21

22  
23 /S/ Matthew Maclear  
Matthew Maclear  
24  
25  
26  
27  
28

# **EXHIBIT 1**

Timekeeper	Total Hours	Attorney Lodestar	Billing Judgment Reduction	Adjusted Lodestar*	Percent reduction
Boyd, Kirk	12.60	\$9,135.00	7.30	\$3,842.50	57.94%
Verick, William	7.60	\$5,510.00	2.10	\$3,987.50	27.63%
Packard, Andrew	4.30	\$3,117.50	1.60	\$2,610.00	37.21%
Flanders, Jason	13.30	\$8,312.50	1.30	\$7,500.00	9.77%
Maclear, Matthew	6.90	\$5,460.00	1.50	\$4,485.00	21.74%
Maharg, Erica	16.50	\$8,682.50	1.50	\$7,245.00	9.09%
Beck, Harrison	31.90	\$10,367.50	12.90	\$6,353.75	40.44%
<b>Attorney Total</b>	<b>93.1</b>	<b>\$50,585.00</b>	<b>28.20</b>	<b>\$36,023.75</b>	<b>29.12%</b>

\* Attorney adjusted lodestar includes hours cut, written off or reclassified at paralegal or legal assistant rates.

Timekeeper	Paralegal Hours	Paralegal Lodestar	Legal Assistant Time Reduction	Billing Judgment Reduction	Adjusted Paralegal Lodestar	Legal Assistant Lodestar	Total Adjusted Lodestar	Percent Lodestar Reduction
Bustos, Esmeralda	18.40	\$3,956.00	4.00	4.30	\$3,031.50	\$500.00	\$2,986.50	23.37%
Totals								

	Total Hours	Total Lodestar	Total Hours Reduced	Adjusted Lodestar	Percent Hour Reduction
Lodestar Fees	<b>111.50</b>	<b>\$54,541.00</b>	<b>32.20</b>	<b>\$39,010.25</b>	<b>28.88%</b>
		Reply Fees Total		<b>\$39,010.25</b>	

Date	Staff	Description	Attorney Hours	Attorney Rate	Attorney Lodestar	Paralegal Hours	Paralegal Rate	Paralegal Lodestar	Legal Assistant Hours	Legal Assistant Rate	Legal Assistant Lodestar	Billing Judgment Reduction	Hours After Reduction for Billing Judgment	Adjusted Lodestar
11/22/2024	Kirk Boyd	Review Defendant's Opposition to Plaintiff's Motion for Attorney's Fees	0.50	\$725.00	\$362.50									\$362.50
11/24/2024	Kirk Boyd	Research Defendant's cases on multiplier.	0.5	\$725.00	\$362.50									\$362.50
11/24/2024	Kirk Boyd	Research state law for multiplier.	0.5	\$725.00	\$362.50									\$362.50
11/27/2024	Kirk Boyd	Research discovery in case and draft my Supplemental Declaration	1.2	\$725.00	\$870.00							0.60	0.60	\$435.00
11/28/2024	Kirk Boyd	Review Defendant Opposition to Fees and Defendant's Declaration in Support of Opposition	0.70	\$725.00	\$507.50							0.70	0.00	\$0.00
11/28/2024	Kirk Boyd	Revise and edit my Supplemental Declaration. Send Supplemental Declaration to team	0.80	\$725.00	\$580.00									\$580.00
11/28/2024	Kirk Boyd	Research multiplier based on state law and draft memo to team on multiplier based on state law, send team memo on multiplier.	1.30	\$725.00	\$942.50							1.00	0.30	\$217.50
12/2/2024	Kirk Boyd	Research Richard Pearl's treatise at SF Law Library on fee multipliers for state and federal actions	3.00	\$725.00	\$2,175.00							2.50	0.50	\$362.50
12/2/2024	Kirk Boyd	Email to team re multiplier argument for Reply brief	0.30	\$725.00	\$217.50									\$217.50
12/4/2024	Kirk Boyd	Edit and expand my Supplemental Declaration re dormant period and status conferences.	1.50	\$725.00	\$1,087.50							1.00	0.50	\$362.50
12/5/2024	Kirk Boyd	Review Verick Supplemental Declaration and send team email re Declarations.	1.00	\$725.00	\$725.00							1.00	0.00	\$0.00
12/5/2024	Kirk Boyd	Edit my Supplemental Declaration and send to team.	0.80	\$725.00	\$580.00									\$580.00

J.K. Boyd Lodestar

Date	Staff	Description	Attorney Hours	Attorney Rate	Attorney Lodestar	Paralegal Hours	Paralegal Rate	Paralegal Lodestar	Legal Assistant Hours	Legal Assistant Rate	Legal Assistant Lodestar	Billing Judgment Reduction	Hours After Reduction for Billing Judgment	Adjusted Lodestar
12/5/2024	Kirk Boyd	Review draft Reply brief and email team re brief.	0.50	\$725.00	\$362.50							0.50	0.00	\$0.00
		<b>Grand Totals</b>	<b>12.60</b>		<b>\$9,135.00</b>									<b>\$3,842.50</b>

Time Period	Total Time	Total Amount	Amount Written Off per time period	Adjusted Lodestar per time period	% hrs written off
10/31/24 - present	12.6	\$9,135.00	7.3	\$3,842.50	57.94%

William Verick Lodestar

Date	Staff	Description	Attorney Hours	Attorney Rate	Attorney Lodestar	Paralegal Hours	Paralegal Rate	Paralegal Lodestar	Legal Assistant Hours	Legal Assistant Rate	Legal Assistant Lodestar	Billing Judgment Reduction	Hours After Reduction for Billing Judgment	Adjusted Lodestar
12/3/2024	WLV	Read opposition brief	1.70	\$725.00	\$1,232.50									\$1,232.50
12/3/2024	WLV	Telephone call with M. Maclear re supplemental declaration	0.30	\$725.00	\$217.50							0.30	0.00	\$0.00
12/3/2024	WLV	Draft supplemental declaration re dormant case period and multiplier	2.30	\$725.00	\$1,667.50									\$1,667.50
12/4/2024	WLV	Telephone call with M. Maclear re edits he made to my supplemental declaration	0.20	\$725.00	\$145.00							0.20	0.00	\$0.00
12/4/2024	WLV	Review M. Maclear edits and edit my supplemental declaration to bolster Prop 65 issues; finalize declaration	1.50	\$725.00	\$1,087.50									\$1,087.50
12/6/2024	WLV	Analyze and revise Reply brief.	0.70	\$725.00	\$507.50							0.70	0.00	\$0.00
12/6/2024	WLP	Fianlize my declaration	0.90	\$725.00	\$652.50							0.90	0.00	\$0.00
<b>Grand Totals</b>			<b>7.60</b>		<b>\$5,510.00</b>							<b>2.10</b>		<b>\$3,987.50</b>

Time Period	Total Time	Total Amount	Amount Written Off per time period	Adjusted Lodestar per time period	% hrs written off
10/31/24 - present	7.60	\$4,857.50	2.10	\$3,987.50	27.63%



Andrew Packard Lodestar

Date	Staff	Description	Attorney Hours	Attorney Rate	Attorney Lodestar	Paralegal Hours	Paralegal Rate	Paralegal Lodestar	Legal Assistant Hours	Legal Assistant Rate	Legal Assistant Lodestar	Billing Judgment Reduction	Hours After Reduction for Billing Judgment	Adjusted Lodestar
12/2/2024	ALP	TCs re multiplier strategy to fee experts Dick Rothschild and Bob Newman at Western Center on Law and Poverty, and to fee expert Jordanna Thigpen	0.4	\$725.00	\$290.00							0.40	0.00	\$0.00
12/2/2024	ALP	TCs with Maclear, Maharg re expert and briefing needs on reply	0.6	\$725.00	\$435.00							0.30	0.30	\$217.50
12/4/2024	ALP	review Defense opp to motion for fees and draft reply arguments distinguishing Forever Resorts motion to approve CD decision	1.6	\$725.00	\$1,160.00									\$1,160.00
12/5/2024	ALP	review time sheets and confer with MM re edits to reply decs (Verick, Boyd)	0.8	\$725.00	\$580.00									\$580.00
12/6/2024	ALP	Edited my declaration (.3) and analyzed/edited reply brief (.3) and reviewed communications amongst co-counsel (.3)	0.90	\$725.00	\$652.50							0.90	0.00	\$652.50
<b>Grand Totals</b>			<b>4.30</b>		<b>\$3,117.50</b>							<b>1.60</b>		<b>\$2,610.00</b>

Time Period

Total Time	Total Amount	Amount Written Off Per Time Period	Adjusted Lodestar Per Time Period	% hrs written off
4.30	\$3,117.50	1.60	\$2,610.00	37.21%

10/31/24 - present  
Andrew Packard

Date	Staff	Description	Attorney Hours	Attorney Rate	Attorney Lodestar	Paralegal Hours	Paralegal Rate	Paralegal Lodestar	Legal Assistant Hours	Legal Assistant Rate	Legal Assistant Lodestar	Billing Judgment Reductions	Hours After Reductions for Billing Judgment	Adjusted Lodestar
11/12/2024	Jason Flanders	A105 Communicate (in firm) Calls with M. Maclear and E. Maharg re stipulation on briefing for fee motion, review and calculations re same	0.20	\$625.00	\$125.00									\$125.00
12/1/2024	Jason Flanders	L250 Other Written Motions and Submissions Review of Defendant's prior statements compared to fee motion opposition statements	0.40	\$625.00	\$250.00									\$250.00
12/1/2024	Jason Flanders	L250 Other Written Motions and Submissions Review of opposition to fee motion, emails from co-counsel re same, draft outline for reply from review of same	0.60	\$625.00	\$375.00									\$375.00
12/2/2024	Jason Flanders	L250 Other Written Motions and Submissions Review of H. Beck revisions to reply brief on fee motion, further instructions to H. Beck re same	0.20	\$625.00	\$125.00									\$125.00
12/4/2024	Jason Flanders	L250 Other Written Motions and Submissions Draft reply brief re fee motion	1.90	\$625.00	\$1,187.50							0.5	1.40	\$875.00
12/4/2024	Jason Flanders	L250 Other Written Motions and Submissions Revisions to Fee Motion Reply re: arguments waived by Defendant	0.80	\$625.00	\$500.00									\$500.00
12/4/2024	Jason Flanders	L250 Other Written Motions and Submissions Draft reply brief ISO fee motion	0.90	\$625.00	\$562.50									\$562.50
12/4/2024	Jason Flanders	L250 Other Written Motions and Submissions Draft reply brief ISO fee motion	1.00	\$625.00	\$625.00									\$625.00
12/4/2024	Jason Flanders	L250 Other Written Motions and Submissions Draft reply brief re fee motion	1.90	\$625.00	\$1,187.50							0.5	1.40	\$875.00
12/4/2024	Jason Flanders	L250 Other Written Motions and Submissions Revisions to fee motion reply re arguments waived by defendant	0.80	\$625.00	\$500.00									\$500.00
12/4/2024	Jason Flanders	L250 Other Written Motions and Submissions Review of Packard memo in support of fee motion reply brief	0.20	\$625.00	\$125.00									\$125.00
12/4/2024	Jason Flanders	L250 Other Written Motions and Submissions Review of Verick declaration ISO reply fee motion	0.10	\$625.00	\$62.50									\$62.50
12/5/2024	Jason Flanders	L250 Other Written Motions and Submissions Draft reply brief ISO fee motion	1.70	\$625.00	\$1,062.50							0.3	1.40	\$875.00

Jason Flanders Lodestar

Date	Staff	Description	Attorney Hours	Attorney Rate	Attorney Lodestar	Paralegal Hours	Paralegal Rate	Paralegal Lodestar	Legal Assistant Hours	Legal Assistant Rate	Legal Assistant Lodestar	Billing Judgment Reductions	Hours After Reductions for Billing Judgment	Adjusted Lodestar
12/5/2024	Jason Flanders	L250 Other Written Motions and Submissions Revisions to fee motion reply brief	0.20	\$625.00	\$125.00									\$125.00
12/5/2024	Jason Flanders	L250 Other Written Motions and Submissions Call with E. Maharg re reply for fee motion	0.20	\$625.00	\$125.00									\$125.00
12/5/2024	Jason Flanders	L250 Other Written Motions and Submissions Call with H. Beck re reply brief on fee motion	0.10	\$625.00	\$62.50									\$62.50
12/6/2024	Jason Flanders	L250 Other Written Motions and Submissions Call with H. Beck re finalizing reply brief ISO fee motion	0.10	\$625.00	\$62.50									\$62.50
12/6/2024	Jason Flanders	L250 Other Written Motions and Submissions Further revisions to fee motion reply brief to include additional facts and further multiplier analysis.	1.00	\$625.00	\$625.00									\$625.00
12/7/2024	Jason Flanders	L250 Other Written Motions and Submissions Finalize entire Reply brief ISO fee motion	1.00	\$625.00	\$625.00									\$625.00
Grand Totals			13.30		\$8,312.50							1.30		\$7,500.00

Total Time	Total Amount	Amount Written Off	Adjusted Lodestar	% hrs written off
13.30	\$8,312.50		\$7,500.00	10%

Matthew Maclear Lodestar

Date	Staff	Description	Attorney Hours	Attorney Rate	Attorney Lodestar	Paralegal Hours	Paralegal Rate	Paralegal Lodestar	Legal Assistant Hours	Legal Assistant Rate	Legal Assistant Lodestar	Billing Judgment Reductions	Hours After Reductions for Billing Judgment	Adjusted Lodestar
11/11/2024	MCM	L250 Other Written Motions and Submissions Analyze and reply to emails from M. Nomellini re: D's request for an extra week to respond to Motion for Fees and Costs	0.20	\$650.00	\$1,105.00									\$1,105.00
11/12/2024	MCM	L250 Other Written Motions and Submissions Multiple emails and phone calls with M. Nomellini and internally at ATA re: different extension dates for CSPA and PacBell due to holidays.	0.80	\$650.00	\$520.00							0.40	0.40	\$260.00
11/22/2024	MCM	L250 Other Written Motions and Submissions Analyze D's Opposition to Fees and Costs Motion (.7) and draft counter points for use in Reply (1.0).	1.70	\$650.00	\$1,105.00									\$1,105.00
12/2/2024	MCM	L250 Other Written Motions and Submissions Call with M. Maclear and A. Packard re preparing reply ISO mtn for fees and costs.	0.60	\$650.00	\$390.00							0.30	0.30	\$195.00
12/5/2024	MCM	L250 Other Written Motions and Submissions Analyze and revise/comment on declarations of K. Boyd (.7), W. Verick (.4) and E. Maharg (.3).	1.40	\$650.00	\$910.00									\$910.00
12/5/2024	MCM	L250 Other Written Motions and Submissions Analyze and revise/comment on Reply brief	0.80	\$650.00	\$520.00									\$520.00
12/6/2024	MCM	L250 Other Written Motions and Submissions Analyze time entered and exercise billing judgment	0.60	\$650.00	\$390.00									\$390.00
12/6/2024	MCM	L250 Other Written Motions and Submissions Draft and revise declarations for ATA timekeepers and co-counsel regarding additional hours.	0.80	\$650.00	\$520.00							0.80	0.00	\$0.00
<b>Grand Totals</b>			<b>6.90</b>		<b>\$5,460.00</b>							<b>1.50</b>		<b>\$4,485.00</b>

<b>Total Time</b>	<b>Total Amount</b>	<b>Amount Written Off</b>	<b>Adjusted Lodestar</b>	<b>% hrs written off</b>
<b>6.90</b>	<b>\$5,460.00</b>	<b>1.50</b>	<b>\$4,485.00</b>	<b>22%</b>

Erica Maharg Lodestar

Date	Staff	Description	Attorney Hours	Attorney Rate	Attorney Lodestar	Paralegal Hours	Paralegal Rate	Paralegal Lodestar	Legal Assistant Hours	Legal Assistant Rate	Legal Assistant Lodestar	Billing Judgment Reduction	Hours After Reduction for Billing Judgment	Adjusted Lodestar
10/31/24	Erica Maharg	L250 Other Written Motions and Submissions Help finalize fee motion, declarations, and lodestar exhibits.	2.70	\$575.00	\$1,552.50							0.70	1.00	\$575.00
10/31/24	Erica Maharg	L250 Other Written Motions and Submissions Review I. Wren declaration ISO fee motion.	0.20	\$575.00	\$115.00									\$115.00
10/31/24	Erica Maharg	L250 Other Written Motions and Submissions Revise language in fee motion re meet and confer processes; modify declaration re same.	0.70	\$575.00	\$402.50									\$402.50
11/7/2024	Erica Maharg	L160 Settlement/Non-Binding ADR Call with M. Maclear re entry of CD and following up with opposing counsel re status of authorizations.	0.10	\$575.00	\$57.50									\$57.50
11/7/2024	Erica Maharg	L160 Settlement/Non-Binding ADR Email client re entry of CD and status of removal.	0.10	\$575.00	\$57.50									\$57.50
11/7/2024	Erica Maharg	L160 Settlement/Non-Binding ADR Email opposing counsel re status of authorizations.	0.10	\$575.00	\$57.50									\$57.50
11/7/2024	Erica Maharg	L450 Trial and Hearing Attendance Attend hearing re motion to approve CD.	0.30	\$575.00	\$172.50									\$172.50
11/7/2024	Erica Maharg	L450 Trial and Hearing Attendance Call with M. Maclear to prepare for motion to approve hearing.	0.10	\$575.00	\$57.50									\$57.50
11/7/2024	Erica Maharg	L450 Trial and Hearing Attendance Prepare for motion to approve CD hearing.	0.30	\$575.00	\$172.50									\$172.50
11/11/2024	Erica Maharg	L120 Analysis/Strategy Calculate new proposed deadlines for stipulated extension of fee motion briefing; email coordination with M. Maclear and J. Flanders re same.	0.20	\$575.00	\$115.00									\$115.00
12/2/2024	Erica Maharg	L250 Other Written Motions and Submissions Call with M. Maclear and A. Packard re preparing reply ISO mtn for fees and costs.	0.60	\$575.00	\$345.00							0.30	0.30	\$172.50
12/2/2024	Erica Maharg	L250 Other Written Motions and Submissions Call with M. Maclear and J. Flanders re preparing reply.	0.40	\$575.00	\$230.00							0.40	0.00	\$0.00

Erica Maharg Lodestar

Date	Staff	Description	Attorney Hours	Attorney Rate	Attorney Lodestar	Paralegal Hours	Paralegal Rate	Paralegal Lodestar	Legal Assistant Hours	Legal Assistant Rate	Legal Assistant Lodestar	Billing Judgment Reduction	Hours After Reduction for Billing Judgment	Adjusted Lodestar
12/2/2024	Erica Maharg	L250 Other Written Motions and Submissions Email with co-counsel re preparing reply.	0.10	\$575.00	\$57.50									\$57.50
12/3/2024	Erica Maharg	L250 Other Written Motions and Submissions Draft supplemental declaration ISO Fee Motion.	0.10	\$575.00	\$57.50							0.10	0.00	\$0.00
12/4/2024	Erica Maharg	L250 Other Written Motions and Submissions Draft supplemental declaration ISO fee motion re discovery efforts and time spent.	3.40	\$575.00	\$1,955.00									\$1,955.00
12/4/2024	Erica Maharg	L250 Other Written Motions and Submissions Review email correspondence related to discovery disputes for fee motion reply.	4.30	\$575.00	\$2,472.50									\$2,472.50
12/5/2024	Erica Maharg	L250 Other Written Motions and Submissions Draft supplemental declaration ISO fee mtn (motion to amend process).	1.00	\$575.00	\$575.00									\$575.00
12/6/2024	Erica Maharg	L250 Other Written Motions and Submissions Revise declaration ISO fee motion.	0.40	\$575.00	\$230.00									\$230.00
12/6/2024	Erica Maharg	L250 Other Written Motions and Submissions Review/revise reply ISO fee motion.	1.40	\$575.00	\$805.00									\$805.00
<b>Grand Totals</b>			<b>16.50</b>		<b>\$8,682.50</b>									<b>\$7,245.00</b>

Total Time	Total Amount	Amount Written Off	Adjusted Lodestar	% hrs written off
16.50	\$8,682.50	1.50	\$7,245.00	9%

Harrison Beck Lodestar

Date	Staff	Description	Attorney Hours	Attorney Rate	Attorney Lodestar	Paralegal Hours	Paralegal Rate	Paralegal Lodestar	Legal Assistant Hours	Legal Assistant Rate	Legal Assistant Lodestar	Billing Judgment Reductions	Hours After Reductions for Billing Judgment	Adjusted Lodestar
10/31/2024	Harrison Beck	L250 Other Written Motions and Submissions Attempt to resolve issue with totals for categories and timekeepers' in lodestar spreadsheet by redo-ing my calculations several times, re-categorizing A. Packard's and W. Carlon's combined time, and reviewing entries in lodestar (to no avail).	1.10	\$325.00	\$357.50									\$357.50
10/31/2024	Harrison Beck	L250 Other Written Motions and Submissions Call with E. Maharg re: issue with totals in each category and for each attorney in lodestar spreadsheet.	0.30	\$325.00	\$97.50							0.30	0.00	\$0.00
10/31/2024	Harrison Beck	L250 Other Written Motions and Submissions Call with M. Maclear re: issues with category and timekeeper totals in lodestar spreadsheet.	0.10	\$325.00	\$32.50							0.10	0.00	\$0.00
10/31/2024	Harrison Beck	L250 Other Written Motions and Submissions Call with M. Maclear re: removing figure 1 from his declaration.	0.10	\$325.00	\$32.50							0.10	0.00	\$0.00
10/31/2024	Harrison Beck	L250 Other Written Motions and Submissions Check-in call with E. Bustos and M. Maclear re: outstanding issues and issues with totals for categories and timekeepers in lodestar spreadsheet.	0.50	\$325.00	\$162.50									\$162.50
10/31/2024	Harrison Beck	L250 Other Written Motions and Submissions Copyedit fee motion for typos and to check references to Maclear Declaration and legal citations and to leave comments re: outstanding issues therein.	1.80	\$325.00	\$585.00							1.80	0.00	\$0.00
10/31/2024	Harrison Beck	L250 Other Written Motions and Submissions Draft email to M. Maclear and E. Bustos re: outstanding issues to discuss at check-in call.	0.20	\$325.00	\$65.00							0.20	0.00	\$0.00
10/31/2024	Harrison Beck	L250 Other Written Motions and Submissions Edit all declarations to ensure that footer matches caption, per M. Maclear direction.	0.20	\$325.00	\$65.00							0.20	0.00	\$0.00
10/31/2024	Harrison Beck	L250 Other Written Motions and Submissions Edit I. Wren declaration (again, because he didn't edit the version that I'd edited already).	0.50	\$325.00	\$162.50							0.50	0.00	\$0.00
10/31/2024	Harrison Beck	L250 Other Written Motions and Submissions Incorporate Everlaw invoices into exhibits to Maclear Declaration.	0.30	\$325.00	\$97.50							0.30	0.00	\$0.00
10/31/2024	Harrison Beck	L250 Other Written Motions and Submissions Prepare exhibits for filing (by adding cover pages and combing .PDFs with exhibits into single .PDFs).	1.40	\$325.00	\$455.00									\$455.00

Harrison Beck Lodestar

Date	Staff	Description	Attorney Hours	Attorney Rate	Attorney Lodestar	Paralegal Hours	Paralegal Rate	Paralegal Lodestar	Legal Assistant Hours	Legal Assistant Rate	Legal Assistant Lodestar	Billing Judgment Reductions	Hours After Reductions for Billing Judgment	Adjusted Lodestar
10/31/2024	Harrison Beck	L250 Other Written Motions and Submissions Second call with E. Maharg re: issues with totals for categories and timekeepers in fee motion to address her attempt to resolve these issues.	0.10	\$325.00	\$32.50									\$32.50
10/31/2024	Harrison Beck	L250 Other Written Motions and Submissions Help E. Bustos and E. Maharg with filing fee motion.	1.00	\$325.00	\$325.00							1.00	0.00	\$0.00
11/4/2024	Harrison Beck	L250 Other Written Motions and Submissions Call with E. Maharg re: fee motion.	0.10	\$325.00	\$32.50							0.10	0.00	\$0.00
11/5/2024	Harrison Beck	L140 Document/File Management Review email from K. Boyd re: removal of cables.	0.10	\$325.00	\$32.50									\$32.50
11/6/2024	Harrison Beck	L250 Other Written Motions and Submissions Calendar invites re: fee motion deadlines.	0.10	\$325.00	\$32.50									\$32.50
11/7/2024	Harrison Beck	L190 Other Case Assessment, Development and Administration Review and categorize email from E. Maharg re: issuance of Motion to Approve and beginning of actual removal of cables.	0.10	\$325.00	\$32.50									\$32.50
11/11/2024	Harrison Beck	L190 Other Case Assessment, Development and Administration Draft priorities email.	0.05	\$325.00	\$16.25									\$16.25
11/13/2024	Harrison Beck	L250 Other Written Motions and Submissions Review email from E. Maharg re: updated fee motion reply deadlines.	0.10	\$325.00	\$32.50							0.10	0.00	\$0.00
11/18/2024	Harrison Beck	L190 Other Case Assessment, Development and Administration Draft priorities email re: fee motion reply.	0.05	\$325.00	\$16.25							0.50	0.00	\$0.00
11/19/2024	Harrison Beck	L190 Other Case Assessment, Development and Administration RSVP to calendar invites for new deadlines re: fee motion reply.	0.10	\$325.00	\$32.50							0.10	0.00	\$0.00
11/22/2024	Harrison Beck	L190 Other Case Assessment, Development and Administration Draft email to partners re: plan for drafting reply re: fee motion.	0.10	\$325.00	\$32.50									\$32.50



Harrison Beck Lodestar

Date	Staff	Description	Attorney Hours	Attorney Rate	Attorney Lodestar	Paralegal Hours	Paralegal Rate	Paralegal Lodestar	Legal Assistant Hours	Legal Assistant Rate	Legal Assistant Lodestar	Billing Judgment Reductions	Hours After Reductions for Billing Judgment	Adjusted Lodestar
11/22/2024	Harrison Beck	L190 Other Case Assessment, Development and Administration Review and categorize emails re: AT&T's removal of the cables!	0.10	\$325.00	\$32.50									\$32.50
11/22/2024	Harrison Beck	L250 Other Written Motions and Submissions Draft memorandum re: fee motion reply re: Glover v. I.C. Sys., Inc. and Juvera v. Salcido (including research).	1.20	\$325.00	\$390.00									\$390.00
11/22/2024	Harrison Beck	L250 Other Written Motions and Submissions Draft memorandum re: fee motion reply re: Moore v. Mount Zion Baptist Church (including research).	1.00	\$325.00	\$325.00									\$325.00
11/22/2024	Harrison Beck	L250 Other Written Motions and Submissions Draft memorandum re: fee motion reply re: Quevedo v. New Albertsons, Inc., Asberry v. City of Sacramento/Sanitation Dept, and Hinds Invs., L.P. v. United Fabricate Supply Inc. (including research).	1.00	\$325.00	\$325.00									\$325.00
11/22/2024	Harrison Beck	L250 Other Written Motions and Submissions Draft memorandum re: fee motion reply re: reasonableness of proposed cost award (including research).	0.60	\$325.00	\$195.00							0.60	0.00	\$0.00
11/22/2024	Harrison Beck	L250 Other Written Motions and Submissions Draft memorandum re: fee motion reply re: reasonableness of proposed rates (including research).	1.00	\$325.00	\$325.00							1.00	0.00	\$0.00
11/22/2024	Harrison Beck	L250 Other Written Motions and Submissions Draft memorandum re: fee motion reply re: whether we carried our burden to show prevailing rates in forum district.	0.40	\$325.00	\$130.00							0.40	0.00	\$0.00
11/22/2024	Harrison Beck	L250 Other Written Motions and Submissions Draft memorandum re: fee motion reply re: whether you can get fees for work on issues/projects that did not necessarily contribute to the result obtained (including motions that weren't filed), including research related thereto.	1.40	\$325.00	\$455.00									\$455.00
11/22/2024	Harrison Beck	L250 Other Written Motions and Submissions Read opposition brief to fee motion and supporting documents and take notes.	1.20	\$325.00	\$390.00									\$390.00
11/23/2024	Harrison Beck	L250 Other Written Motions and Submissions Edit memorandum re: opposition brief re: fee motion.	0.50	\$325.00	\$162.50									\$162.50
11/24/2024	Harrison Beck	L140 Document/File Management Upload memorandum re: opposition brief to firm's shared drive; draft email to J. Flanders, E. Maharg, and M. Maclear re: same.	0.10	\$325.00	\$32.50							0.10	0.00	\$0.00
11/24/2024	Harrison Beck	L250 Other Written Motions and Submissions Draft memorandum re: opposition brief re: application of fee multiplier.	1.30	\$325.00	\$422.50									\$422.50

Harrison Beck Lodestar

Date	Staff	Description	Attorney Hours	Attorney Rate	Attorney Lodestar	Paralegal Hours	Paralegal Rate	Paralegal Lodestar	Legal Assistant Hours	Legal Assistant Rate	Legal Assistant Lodestar	Billing Judgment Reductions	Hours After Reductions for Billing Judgment	Adjusted Lodestar
12/2/2024	Harrison Beck	L250 Other Written Motions and Submissions Call with J. Flanders re: drafting fee motion reply.	0.30	\$325.00	\$97.50							0.30	0.00	\$0.00
12/2/2024	Harrison Beck	L250 Other Written Motions and Submissions Draft fee motion reply introduction.	0.40	\$325.00	\$130.00							0.40	0.00	\$0.00
12/2/2024	Harrison Beck	L250 Other Written Motions and Submissions Draft fee motion reply section re: costs.	1.00	\$325.00	\$325.00									\$325.00
12/2/2024	Harrison Beck	L250 Other Written Motions and Submissions Draft fee motion reply section re: early settlement.	1.50	\$325.00	\$487.50									\$487.50
12/2/2024	Harrison Beck	L250 Other Written Motions and Submissions Draft fee motion reply section re: multipliers.	1.20	\$325.00	\$390.00									\$390.00
12/2/2024	Harrison Beck	L250 Other Written Motions and Submissions Draft fee motion reply section re: novelty of this litigation.	1.10	\$325.00	\$357.50									\$357.50
12/2/2024	Harrison Beck	L250 Other Written Motions and Submissions Draft fee motion reply sections re: reasonableness of hours expended.	2.80	\$325.00	\$910.00							1.80	1.10	\$357.50
12/2/2024	Harrison Beck	L250 Other Written Motions and Submissions Format fee motion reply.	0.20	\$325.00	\$65.00									\$65.00
12/2/2024	Harrison Beck	L250 Other Written Motions and Submissions Review and categorize emails re: fee motion between in-firm partners and outside counsel.	0.10	\$325.00	\$32.50									\$32.50
12/2/2024	Harrison Beck	L250 Other Written Motions and Submissions Review emails from M. Maclear re: thoughts on fee motion reply.	0.10	\$325.00	\$32.50									\$32.50
12/3/2024	Harrison Beck	L250 Other Written Motions and Submissions Review and categorize emails from co-counsel re: declarations for fee motion reply.	0.10	\$325.00	\$32.50									\$32.50
12/3/2024	Harrison Beck	L250 Other Written Motions and Submissions Review citations in J. Kelley declaration and cross-check against actual billing entries and then prepare language for fee motion reply re: the amount of hours actually addressed in defendant's opposition brief.	2.30	\$325.00	\$747.50							1.00	1.30	\$422.50

Harrison Beck Lodestar

Date	Staff	Description	Attorney Hours	Attorney Rate	Attorney Lodestar	Paralegal Hours	Paralegal Rate	Paralegal Lodestar	Legal Assistant Hours	Legal Assistant Rate	Legal Assistant Lodestar	Billing Judgment Reductions	Hours After Reductions for Billing Judgment	Adjusted Lodestar
12/5/2024	Harrison Beck	L250 Other Written Motions and Submissions Draft fee motion reply paragraph re: time between entry of first consent decree and vacatur thereof.	0.60	\$325.00	\$195.00									\$195.00
12/5/2024	Harrison Beck	L250 Other Written Motions and Submissions Draft fee motion reply section re: exhibits cited by defendant.	1.10	\$325.00	\$357.50							1.10	0.00	\$0.00
12/5/2024	Harrison Beck	L250 Other Written Motions and Submissions Edit fee motion reply for typos and prose and citations.	0.70	\$325.00	\$227.50							0.70	0.00	\$0.00
12/5/2024	Harrison Beck	L250 Other Written Motions and Submissions Review and categorize emails from co-counsel re: declarations for fee motion reply.	0.10	\$325.00	\$32.50							0.10	0.00	\$0.00
12/5/2024	Harrison Beck	L250 Other Written Motions and Submissions Review and categorize emails from M. Maclear to co-counsel re: time entry spreadsheet.	0.10	\$325.00	\$32.50							0.10	0.00	\$0.00
Grand Totals			31.90		\$10,367.50							12.90		\$6,353.75

Total Time	Total Amount	Amount Written Off	Adjusted Lodestar	% hrs written off
31.90	\$10,367.50	12.90	\$6,353.75	40%

Date	Staff	Description	Paralegal Hours	Paralegal Rate	Paralegal Lodestar	Legal Assistant Hours	Legal Assistant Rate	Legal Assistant Lodestar	Billing Judgment Reduction	Hours After Reduction for Billing Judgment	Adjusted Lodestar
10/31/24	Esmeralda Bustos	L250 Other Written Motions and Submissions Address legal assistant reclassification totals in lodestar report.	0.80	\$215.00	\$172.00		\$125.00	\$0.00	0.80	0.00	\$0.00
10/31/24	Esmeralda Bustos	L250 Other Written Motions and Submissions Continue cite checking fee motion.	2.40	\$215.00	\$516.00		\$125.00	\$0.00	1.20	1.20	\$258.00
10/31/24	Esmeralda Bustos	L250 Other Written Motions and Submissions Continue creating lodestar and time by category exhibits (.9); begin cite checking motion (.4).	1.30	\$215.00	\$279.50		\$125.00	\$0.00			\$279.50
10/31/24	Esmeralda Bustos	L250 Other Written Motions and Submissions Continue creating Lodestar and time by category tabs for each timekeeper in prepration for declaration exhibits.	2.00	\$215.00	\$430.00		\$125.00	\$0.00	1.00	1.00	\$215.00
10/31/24	Esmeralda Bustos	L250 Other Written Motions and Submissions Draft reply email to H. Beck with copies of Everlaw receipts for costs report.	0.10	\$215.00	\$21.50		\$125.00	\$0.00			\$21.50
10/31/24	Esmeralda Bustos	L250 Other Written Motions and Submissions Efile Maclear declaration	0.50	\$215.00	\$107.50	0.50	\$125.00	\$62.50			\$62.50
10/31/24	Esmeralda Bustos	L250 Other Written Motions and Submissions Efile motion, proposed order and 15 declarations.	0.40	\$215.00	\$86.00	0.40	\$125.00	\$50.00			\$86.00
10/31/24	Esmeralda Bustos	L250 Other Written Motions and Submissions Finish cite checking fee motion and incorporate tables.	1.30	\$215.00	\$279.50		\$125.00	\$0.00			\$279.50
10/31/24	Esmeralda Bustos	L250 Other Written Motions and Submissions Further formatting of lodestar and time by category tabs.	2.30	\$215.00	\$494.50		\$125.00	\$0.00	1.30	1.00	\$215.00
10/31/24	Esmeralda Bustos	L250 Other Written Motions and Submissions Prepare declaration pdfs and motion papers for efilng, ensuring they meet ECF file size guidelines.	0.90	\$215.00	\$193.50	0.90	\$125.00	\$112.50			\$193.50
10/31/24	Esmeralda Bustos	L250 Other Written Motions and Submissions Teams meeting with M. Maclear and H. Beck re: tasks complete lodestar and fee motion.	0.60	\$215.00	\$129.00		\$125.00	\$0.00			\$129.00
10/31/24	Esmeralda Bustos	L250 Other Written Motions and Submissions Troubleshoot Maclear declaration ECF upload errors, specifically exhibit 2.	0.80	\$215.00	\$172.00		\$125.00	\$0.00			\$172.00
11/1/24	Esmeralda Bustos	L140 Document/File Management Download and save to file ECF docket entries of motion for attorney fees and supporting declarations.	0.50	\$215.00	\$107.50	0.50	\$125.00	\$62.50			\$107.50
11/1/24	Esmeralda Bustos	L140 Document/File Management Download and save to file ECF docket entry 155, notice of lodging of amended consent decree.	0.10	\$215.00	\$21.50	0.10	\$125.00	\$12.50			\$21.50
11/6/24	Esmeralda Bustos	L190 Other Case Assessment, Development and Administration Calendar fee motion hearing and associated opposition and reply deadlines.	0.20	\$215.00	\$43.00	0.20	\$125.00	\$25.00			\$43.00
11/6/24	Esmeralda Bustos	L190 Other Case Assessment, Development and Administration Search Judge Peterson's standing order for guidance on zoom appearance for motion hearings.	0.10	\$215.00	\$21.50	0.10	\$125.00	\$12.50			\$21.50
11/6/24	Esmeralda Bustos	L190 Other Case Assessment, Development and Administration Teams comms with E. Maharg re: emails from courtroom deputy with zoom links to hearings and judge's standing order re: same.	0.20	\$215.00	\$43.00		\$125.00	\$0.00			\$43.00

Date	Staff	Description	Paralegal Hours	Paralegal Rate	Paralegal Lodestar	Legal Assistant Hours	Legal Assistant Rate	Legal Assistant Lodestar	Billing Judgment Reduction	Hours After Reduction for Billing Judgment	Adjusted Lodestar
11/6/24	Esmeralda Bustos	L190 Other Case Assessment, Development and Administration Text and teams comms with M. Maclear re: status of zoom link for tomorrow's hearing.	0.10	\$215.00	\$21.50	0.10	\$125.00	\$12.50			\$21.50
11/7/24	Esmeralda Bustos	L140 Document/File Management Download and save to file ECF docket entries 158-164.	0.10	\$215.00	\$21.50	0.10	\$125.00	\$12.50			\$21.50
11/7/24	Esmeralda Bustos	L140 Document/File Management Download and save to file ECF docket entry 165, amended final consent decree.	0.10	\$215.00	\$21.50	0.10	\$125.00	\$12.50			\$21.50
11/19/24	Esmeralda Bustos	L190 Other Case Assessment, Development and Administration Calendar new hearing date and opposition and reply deadlines associated with motion for attorneys fees per order at ECF no. 168.	0.30	\$215.00	\$64.50	0.30	\$125.00	\$37.50			\$64.50
11/20/24	Esmeralda Bustos	L190 Other Case Assessment, Development and Administration Review Everlaw September and October analytics to calculate and record data storage costs, including for this matter.	0.20	\$215.00	\$43.00		\$125.00	\$0.00			\$43.00
11/21/24	Esmeralda Bustos	L140 Document/File Management Download and save to file ECF docket entries for opposition to motion for attorneys fees.	0.10	\$215.00	\$21.50	0.10	\$125.00	\$12.50			\$21.50
11/21/24	Esmeralda Bustos	L140 Document/File Management Download and save to file settlement upload confirmation to AG website.	0.20	\$215.00	\$43.00	0.20	\$125.00	\$25.00			\$43.00
11/22/24	Esmeralda Bustos	L140 Document/File Management Download and save to file ECF docket 172, defendant's motion for leave.	0.10	\$215.00	\$21.50	0.10	\$125.00	\$12.50			\$21.50
11/22/24	Esmeralda Bustos	L140 Document/File Management Download and save to file ECF docket entries 171, opposition to motion for attorneys fees.	0.10	\$215.00	\$21.50	0.10	\$125.00	\$12.50			\$21.50
11/22/24	Esmeralda Bustos	L190 Other Case Assessment, Development and Administration Draft email to M. Maclear with copies of opposition to motion for attorneys fees.	0.10	\$215.00	\$21.50		\$125.00	\$0.00			\$21.50
12/2/24	Esmeralda Bustos	L140 Document/File Management Download and save to file ECF docket entries 173-175.	0.20	\$215.00	\$43.00	0.20	\$125.00	\$25.00			\$43.00
12/5/24	Esmeralda Bustos	Teleconference with M. Maclear re: rules on reply page limit.	0.10	\$215.00	\$21.50		\$125.00	\$0.00			\$21.50
12/5/24	Esmeralda Bustos	L430 Written Motions and Submissions Add W. Verick's billable hours post fee motion filing.	0.10	\$215.00	\$21.50		\$125.00	\$0.00			\$21.50
12/5/24	Esmeralda Bustos	L430 Written Motions and Submissions Begin formatting lodestar spreadsheet template.	0.50	\$215.00	\$107.50		\$125.00	\$0.00			\$107.50
12/5/24	Esmeralda Bustos	L430 Written Motions and Submissions Draft email to E. Maharg and M. Maclear lodestar spreadsheet template with formulas.	0.10	\$215.00	\$21.50		\$125.00	\$0.00			\$21.50
12/5/24	Esmeralda Bustos	L430 Written Motions and Submissions Draft supplemental declaration templates for ATA timekeepers and A. Packard	0.40	\$215.00	\$86.00		\$125.00	\$0.00			\$86.00
12/5/24	Esmeralda Bustos	L430 Written Motions and Submissions Finish formatting lodestar report template.	0.40	\$215.00	\$86.00		\$125.00	\$0.00			\$86.00
12/5/24	Esmeralda Bustos	L430 Written Motions and Submissions Further drafting of supplemental declaration templates of ATA timekeepers.	0.20	\$215.00	\$43.00		\$125.00	\$0.00			\$43.00

Esmeralda Bustos Lodestar

Date	Staff	Description	Paralegal Hours	Paralegal Rate	Paralegal Lodestar	Legal Assistant Hours	Legal Assistant Rate	Legal Assistant Lodestar	Billing Judgment Reduction	Hours After Reduction for Billing Judgment	Adjusted Lodestar
12/5/24	Esmeralda Bustos	L430 Written Motions and Submissions Teleconference with M. Maclear re: assignments for reply brief.	0.20	\$215.00	\$43.00		\$125.00	\$0.00			\$43.00
12/5/24	Esmeralda Bustos	L430 Written Motions and Submissions Teleconference with M. Maclear for further guidance on preparing lodestar spreadsheet.	0.10	\$215.00	\$21.50		\$125.00	\$0.00			\$21.50
12/5/24	Esmeralda Bustos	L430 Written Motions and Submissions Teleconference with M. Maclear re: preparing supplemental timekeeper declarations for ATA timekeepers and Packard.	0.10	\$215.00	\$21.50		\$125.00	\$0.00			\$21.50
12/5/24	Esmeralda Bustos	L430 Written Motions and Submissions Teleconference with M. Maclear re: status of supplement declaration assignment.	0.10	\$215.00	\$21.50		\$125.00	\$0.00			\$21.50
<b>Grand Total</b>			<b>18.40</b>		<b>\$3,956.00</b>	<b>4.00</b>		<b>\$500.00</b>			<b>\$2,986.50</b>

Paralegal Hours	Paralegal Lodestar	Legal Assistant Time Reduction	Billing Judgment Reduction	Adjusted Paralegal Lodestar	Legal Assistant Lodestar	Total Adjusted Lodestar	Percent Lodestar Reduction
18.40	\$3,956.00	4.00	4.30	\$3,031.50	\$500.00	\$2,986.50	23.37%